

## **REMARKS**

In the Office Action, claim 14 was rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Claims 1-13 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 1-11 and 14 were rejected under 35 U.S.C. §102(e) as being anticipated by Jiang et al. (U.S. Pat. No. 7,092,370). Claims 12 and 13 were rejected under 35 U.S.C. §103(a) as being unpatentable over Jiang, in view of Aegerter (U.S. Pat. Pub. No. 2002/0069182).

Claim 15 includes the subject matter of original claims 1 to 7 and matter drawn from page 6, lines 5-25; page 9, lines 22 – 26; page 10, lines 16 – 23; page 11, lines 1 – 5; and page 13 line 17 to page 14 line 4.

Claims 16, 17 and 22 – 25 are based on original claim 1 and claims 18 – 21 are based on matter in page 11 lines 6 – 32.

The messaging gateway of claim 15 addresses the problem of providing a gateway which caters with more versatility with varying types of: service to be provided, applications to interface with, user devices to interface with, volumes and rates of information transfer, and multiple bearers. It was also desired to be able to

perform substantial relevant intermediate processing of messages rather than merely being a relay between the mobile domain and the Internet domain.

The solution of claim 15 allows provision of wide-ranging messaging services in a flexible manner, catering for both changes in application services and user device technology.

In claim 15 the gateway is modular in nature to the extent of being able to provide a service dictated by a path through the gateway nodes, in terms of routing, validation, and filtering aspects. Importantly, there is a synergy between the modular nature of the nodes and the capabilities of the three types of nodes. For example, the fact that the network nodes can manage context for a device making a request, convert an input into a Web request using input data, device context, and application context; add user and location context to requests; translate responses into a device-specific format using response data, device context, and application context; and update and store context between device interactions allow the gateway nodes to perform more comprehensive processing. It is particularly advantageous that the network nodes can convert a Mobile Originated (“MO”) input into a Web request using device and application context and the fact that the nodes can add user and location context to such requests.

The gateway allows intelligent persistent transactions to take place, with co-ordination for rich end-to-end application to user interactions and intelligent end-to-end flow, enabling multi-stage user interaction and improving the quality of user interaction. There is further synergy arising from the fact that the nodes split Web application responses according to adapter capabilities, content attributes, and rules. Further versatility is achieved by providing multiple network nodes, readily enabling multiple network bearers.

The systems of the prior art did not provide these aspects. Jiang et al. describes a platform for integration of wireless voice and data channels. It focuses on allowing one to trigger a session in one of voice or data to a session in the other. There is no disclosure of the network nodes, gateway nodes, and application access nodes as claimed. Jiang at col. 6, line 64 to col. 7, line 1 merely mentions translation in general terms without disclosure of use of device context and application context. Jiang at col. 6, lines 61-64 mention management of user information and not context between device interactions. Jiang does describe a network integration layer 202 in Fig. 2, but there is no mention or suggestion of network access nodes managing context, converting an input into a Web request using input data, device context, and application context, adding user location and context to requests, or updating and storing context between device interactions.

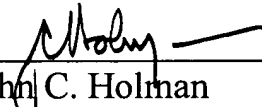
Regarding the gateway nodes, Jiang merely describes gateway aspects at a high level, not relevant to what is claimed in claim 15. Jiang at col. 9, lines 45 to 59 merely describes concert ticket purchasing at a general level. There is no disclosure or suggestion of the gateway node aspects of claim 15. The gateway nodes of claim 15 advantageously provide a series of routing, validation, and filtering database functions for content and routing management of messaging traffic. Advantageously, the service provided by the gateway is determined by the path taken through the gateway nodes. The nodes may be easily updated using the claimed API framework.

Based on the foregoing amendments and remarks, it is respectfully submitted that the present application should now be in condition for allowance. A Notice of Allowance is in order, and such favorable action and reconsideration are respectfully requested.

However, if after reviewing the above amendments and remarks, the Examiner has any questions or comments, she is cordially invited to contact the undersigned attorneys.

Respectfully submitted,

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